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# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DARRELL G. OBER	)	CIVIL ACTION LAW	HARRISBURG,
Plaintiff	)	NO. 1-01-CV-84	JUN 0 5 2002
VS.	)	NO.   0   0   1	MARY E. D'ANDREA
PAUL EVANKO ET. AL.	) ) )	JURY TRIAL DEMAND	ED
Defendants	)	(JUDGE CALDWELL)	

### PLAINTIFFS MOTION FOR ENLARGEMENT OF TIME

- Defendants filed their Motion for Summary Judgment on or about May
  20, 2002. Plaintiff received their Motion on or about Wednesday, May 22, 2002.
  - 2.) The amount of material to be reviewed is massive.
  - 3.) This court has already granted defendants a 10-day enlargement of time.
- 4.) Plaintiffs response to defendants Motion for Summary Judgment would normally be due on June 7, 2002.
- 5.) Plaintiff respectfully requests an enlargement until Tuesday, June 11,2002 to respond. And enlargement of two work days and a total of 4 days.

WHEREFORE this Court is respectfully requested to grant plaintiffs their enlargement of time until June 11, 2002 to respond to defendants Summary Judgment Motion.

Respectfully Submitted,

Don Bailey Esquire 4311 N. 6<sup>th</sup> Street

Harrisburg, PA 17110

(717) 221-9500

June 5, 2002

## **CONCURRENCE/NON CONCURRENCE**

Defendants counsel Joanna Reynolds was contacted and unavailable.

Respectfully submitted,

Don Bailey Esquire 4311 N. 6<sup>th</sup> Street

Harrisburg, PA 17110

(717) 221-9500

June 5, 2002

#### IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DARRELL G. OBER	) CIVIL ACTION LAW
Plaintiff	)
	) 1:CV-01-0084
vs.	)
	) (JUDGE CALDWELL)
PAUL EVANKO, MARK	)
CAMPBELL, THOMAS COURY,	) JURY TRIAL DEMANDED
JOSEPH WESTCOTT,	)
HAWTHORNE CONLEY	)
Defendants	)

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this <sup>5TH DAY OF JUNE 2002</sup> true and correct copy of the **PLAINTIFFS**MOTION FOR ENLARGEMENT OF TIME was served upon the following counsel of record by United States Mail, postage prepaid:

BARBARA CHRISTIE ESQ. JOANNA REYNOLDS, ESQ. 1800 ELMERTON AVENUE HARRISBURG, PA 17110

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BY: Don Barley ID# 23786 4311 N. 6<sup>th</sup> Street Harrisburg, PA 17110

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